

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS, HOUSTON DIVISION**

RUSSELL, et al.

Plaintiffs,

v.

HARRIS COUNTY, TEXAS, et al.

Defendants.

Case No. 4:19-cv-00226

(Class Action)

The Honorable Lee H. Rosenthal

U.S. District Judge

**PLAINTIFFS' RESPONSE TO ATTORNEY GENERAL'S MOTION TO INTERVENE**

Plaintiffs do not oppose intervention of the Texas Attorney General. However, many of the factual claims and legal principles cited in the memorandum are not correct.

Date: March 30, 2020

Respectfully Submitted,

/s/ Alec Karakatsanis

/s/ Elizabeth Rossi

Alec George Karakatsanis (*Pro Hac Vice*)

alec@civilrightscorps.org

Elizabeth Rossi (*Pro Hac Vice*)

elizabeth@civilrightscorps.org

Civil Rights Corps

1601 Connecticut Ave NW, Suite 800

Washington, DC 20009

Telephone: (202) 681-2721

s/ Mimi Marziani

Mimi Marziani (*Pro Hac Vice*)

Texas State Bar No. 24091906

Liyah Brown (*Pro Hac Vice*)

D.C. Bar No. 500149

Meagan T. Harding

Texas State Bar No. 24080179

Southern District No. 3365526

Texas Civil Rights Project

405 N Main St, Suite 716

/s/ Neal S. Manne

Neal S. Manne

Texas Bar No. 12937980

nmanne@susmangodfrey.com

Lexie G. White

Texas Bar No. 24048876

lwhite@susmangodfrey.com

Joseph S. Grinstein

Texas Bar No. 24002188

jgrinstein@susmangodfrey.com

SUSMAN GODFREY L.L.P.

1000 Louisiana Street, Suite 5100

Houston, Texas 77002

Telephone: (713) 651-9366

Facsimile: (713) 654-6666

/s/ Michael Gervais

Michael Gervais (*Pro Hac Vice*)

mgervais@susmangodfrey.com

SUSMAN GODFREY L.L.P.

1900 Avenue of the Stars, #1400

Houston, TX 77002

Phone: 512-474-5073 ext 118

[liyah@texascivilrightsproject.org](mailto:liyah@texascivilrightsproject.org)

[mimi@texascivilrightsproject.org](mailto:mimi@texascivilrightsproject.org)

[meagan@texascivilrightsproject.org](mailto:meagan@texascivilrightsproject.org)

Los Angeles, CA 90067

Telephone: (310) 789-3100

**CERTIFICATE OF SERVICE**

I certify that on March 30, 2020 a true and correct copy of this document properly was served on counsel of record via electronic filing in accordance with the USDC, Southern District of Texas Procedures for Electronic Filing.

/s/ Elizabeth Rossi

Elizabeth Rossi